



U.S. Department of Justice

Antitrust Division

USDOJ SDNY

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May 23, 2013

By Facsimile

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Mark Zaino*, 10 Cr. 434
United States v. Alexander Wright, 12 Cr. 551

Dear Judge Wood:

The Government respectfully writes to request an adjournment of the sentencing dates for Mark Zaino and Alexander Wright, two cooperating defendants who testified in the trial of *United States v. Ghavami, et al.* (No. 10 Cr. 1217). Zaino and Wright are presently scheduled to be sentenced on July 8, 2013 and July 9, 2013, respectively. At the time that those dates were set, defendants in the *Ghavami* matter were scheduled to be sentenced on May 20, 21, and 22, 2013. The *Ghavami* Defendants' sentencing dates have since been rescheduled for July 23 and 24, 2013. Defendants Wright and Zaino testified about, and were involved in, many of the fraudulent transactions at issue in the *Ghavami* trial. Consequently, common issues of loss and restitution may be resolved during the sentencing in the *Ghavami* matter. For this reason, and taking into account the schedules of the Court, the probation officers, and the parties, the Government respectfully requests that Zaino and Wright be scheduled for sentencing during the period of September 17-19, 2013. The Government further suggests that, if convenient to the Court, the two sentences be scheduled for the same date or consecutive dates, so as to reduce travel costs to the Government.

The Government has conferred with counsel for defendants Zaino and Wright regarding this request, and they concur with the time frame suggested by the Government.

Letter to Judge Wood regarding Sentencing Dates
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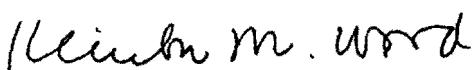
Sentencing for Mark Zaino
will be held on September 17, 2013,
at 2:00 p.m. Sentencing for
Alexander Wright will be held
on September 18, 2013, at 10:00 a.m.

Respectfully,



KALINA M. TULLEY
JOHN W. VAN LONKHUYZEN
Trial Attorneys, Antitrust Division

May 28, 2013
SO ORDERED: N.Y., N.Y.



KIMBA M. WOOD
U.S.D.J.

cc: Deborah A. Schwartz, Esq.
Counsel for Mark Zaino

Sean P. Casey, Esq.
Counsel for Alexander Wright

(via e-mail)